

STATEMENT OF BASIS
Scotch Plywood Company, Inc.
Fulton, Clarke County, Alabama
Facility/Permit No. 102-S006

This Title V Major Source Operating Permit (MSOP) significant modification is issued under the provisions of ADEM Admin. Code r. 335-3-16. The above named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit. The current MSOP was effective on August 26, 2014, and expires on April 22, 2019.

SPCI produces southern pine plywood. The significant sources of air pollutants at this facility are a 17 MSF/hr veneer dryer with 30 MMBtu/hr wood-fired burner with the heated zones controlled by a dedicated electrostatic precipitator and/or RTO Nos. 1-2; a 23.7 MSF/hr veneer dryer with a 30 MMBtu/hr wood-fired burner and two 15 MMBtu/hr natural gas-fired burners with the heated zones controlled by a dedicated electrostatic precipitator and/or RTO Nos. 1-2; two layup lines with glue spreaders; a 20 MMBtu/hr natural gas-fired boiler; a 40-opening plywood press; a 46-opening plywood press; a trim saw with cyclone; a sander machine & tongue and groove machine & panel saw with baghouse; a fuel silo pneumatic system with cyclone; a plywood patch station; a ply shield operation; three resin storage tanks; and a 15,000-gallon gasoline storage tank.

On December 5, 2014, SPCI received a flexibility modification (Section 502(b)10 change) under Title V to modify the No. 2 Veneer Dryer and the Plywood Press No. 2. On September 23, 2015, SPCI received a flexibility modification (Section 502(b)10 change) under Title V to add a panel saw and pneumatic conveyance to the existing baghouse associated with Emission Unit No. 008 (Sanding and Tongue & Groove Machines). On December 20, 2016, Scotch Plywood Company, Inc. (SPCI) was issued Air Permit No. 102-S006-X018. This permitting action established a synthetic minor limit for particulate matter from the pneumatic conveyance systems associated with Emission Units Nos. 007 and 011 (Trim Saw and Hog Cyclone, and Fuel Silo Cyclone) at its plywood facility in Fulton, Alabama.

Significant Modifications to MSOP

1. Incorporate the flexibility modification for the No. 2 Veneer Dryer (EU 002)
2. Incorporate the flexibility modification for the No. 2 Plywood Press (EU 006)
3. Incorporate the flexibility modification for the addition of the panel saw and pneumatic conveyance to the existing baghouse (EU 008)
4. Incorporate the requirements of Air Permit No. X018, for the Trim Saw and Hog Cyclone, and Fuel Silo Cyclone (EU 007 and 011)

Applicability: Federal Regulations

Title V

This facility is a major source under Title V regulations because the potential emissions for particulate matter less than 10 microns in diameter (PM-10) and particulate matter less than 2.5 microns in diameter (PM-2.5) exceed the 100 TPY major source threshold. The facility is a major

source of HAP. The potential emissions of HAP facility-wide are greater than 10 TPY for methanol.

Prevention of Significant Deterioration (PSD)

This facility is located in an attainment area for all criteria pollutants, and its operations are not one of the 28 listed major source categories. Therefore, the major source thresholds of concern is 250 TPY for criteria pollutants. The facility is a synthetic minor source under PSD regulations for PM. No criteria pollutant potential emissions exceed the major source thresholds.

New Source Performance Standards (NSPS)

Emission Unit Nos. 002, 006, 007, 008, and 011 are not subject to any NSPS regulations.

National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63

As a major source of HAP, all of the processes at this facility (except the boiler and gasoline storage tank) are considered affected sources under the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD [adopted by reference at ADEM Admin. Code r. 335-3-11-.06(81)], the “PCWP MACT”. The affected processes are not subject to any compliance or work practice standards.

State Regulations

Particulate Matter

The veneer dryers, the plywood presses, the sanding machine and tongue and groove machine with baghouse, trim saw/hog cyclone, and fuel silo cyclone are subject to the particulate matter (as TSP) emission standards for process industries [ADEM Admin. Code r. 335-3-4-.04(1)]. The allowable particulate emission rates for these units are calculated using the appropriate equation below:

$$E = 3.59P^{0.62} \quad (P < 30 \text{ tons/hour})$$

or

$$E = 17.31P^{0.16} \quad (P \geq 30 \text{ tons/hour})$$

where E = Emissions in pounds/hour
 P = Process weight in tons/hour

Visible Emissions

All sources of particulate emissions at the facility are subject to the State visible emission standards of ADEM Admin. Code r. 335-3-4-.01, which states that any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period and, at no time, shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%.

Emission Testing and Monitoring

The emissions from 007 and 011 shall be visually observed at least daily when operating to determine if visible emissions are greater than normal. They would also be inspected for proper operation and cleaned at least annually but more frequently whenever visible emissions are greater than normal to ensure that the removal efficiency meets the manufacturer specifications. All observations and inspections shall be documented and available for inspection for five years from the date of inception.

No emission testing is required for 007 or 011 to comply with all applicable emission standards. However, if emission problems are observed, an increase in the emission rate is made, or a valid complaint is received, a reassessment of this determination will be made.

Compliance Assurance Monitoring (CAM)

Since cyclones on wood waste pneumatic systems are considered process equipment, CAM would not be required for the fuel silo or trim saw pneumatic system cyclones.

Recordkeeping and Reporting Requirements

The records required for Emission Unit Nos. 007 and 011 would include:

- The date, time, and results of each daily observation for greater than normal visible emissions from each cyclone.
- The date(s), time, nature, and results of any corrective action taken when greater than normal visible emissions were observed from the cyclone.
- The date(s) and time each cyclone was inspected for proper operation and, if the results of the inspection indicated that cleaning or emissions-related maintenance was needed, the date(s) and nature of the cleaning/maintenance performed.

The facility would also be required to include the following information (as applicable) for Emission Unit Nos. 007 and 011 in the Semiannual Monitoring Report required by General Permit Proviso No. 21.

- A statement as to whether all emission observations were completed as required during the reporting period, and if not, the date(s) and reason(s) why the monitoring was not performed.
- The date(s), time, nature, and results of any corrective action taken when (1) greater than normal visible emissions were observed from any emission unit, or (2) an inspection of any emission unit indicated that cleaning or emissions-related maintenance was needed.
- For Emission Unit Nos. 007 and 011, a statement as to whether the annual inspection of the cyclone was accomplished during the reporting period, and if so, the date and results of the inspection.

Public Notice

The significant modification of this Title V MSOP would require a 30-day public comment period and a 45-day EPA review period.

Recommendation

Based on the above analysis, I recommend SPCI's MSOP (102-S006) Significant Modification be issued with the conditions noted above, pending the resolution of any comments received during the 30-day public comment period and 45-day EPA review period.

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Air Division

DRAFT
Date